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August 20, 2021

**Via ECF**

Honorable Paul G. Gardephe  
United States District Judge  
United States District of New York  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Felicia Racine v. Koch Industries, Inc., et al.  
Case No. 1:20-cv-9469 (PGG)(SLC)

Your Honor:

Reference is made to the aforementioned action. This firm represents the Plaintiff, Felicia Racine ("Plaintiff"), and we write this letter in accordance with the August 17, 2021 memo endorsement ordering Plaintiff to "submit billing records in support of the requested attorney's fee award" by August 20, 2021. (Doc. 56).

I am the sole-practitioner of The Law Office of David H. Rosenberg, P.C., attorneys for Plaintiff. As such, I hereby submit these billing records in accordance with the order to do so. (Doc. 56)

Date	Hours	Description
November 11, 2020	2.0	Prepared, drafted, and filed the federal complaint.
January 15, 2021	.5	Prepared, drafted, and filed Plaintiff's response letter to Defendants' letter application concerning service of process.
February 8, 2021	.5	Prepared, drafted, and filed Plaintiff's response letter to Defendants' partial motion to dismiss conference request.
February 18, 2021	.5	Drafted proposed Civil Case Management Plan and joint letter in accordance with the notice of pretrial conference.

February 25, 2021	1.0	Prepared for and appeared at the Court's pre-motion to dismiss conference
March 2, 2021	.5	Prepared, drafted, and filed the amended complaint.
April 15, 2021	1.5	Prepared, drafted, and served document requests and interrogatories to Defendants Mary and Julia Koch.
April 16, 2021	.5	Prepared, and drafted the joint letter written in accordance with the Scheduling Order.
April 20, 2021	1.0	Prepared, drafted, and served document requests and interrogatories to Defendants Koch Industries, Inc. and Matador Security Company NY, LLC.
April 27, 2021	1.0	Prepared and appeared at the Court's conference concerning Plaintiff's discovery dispute letter request for the same.
May 3, 2021	.5	Prepared, drafted, and filed of a letter motion request for a discovery conference.
May 4, 2021	1.0	Prepared, drafted, and served Plaintiff's initial disclosures.
May 19, 2021	1.5	Prepared, drafted, and served Plaintiff's responses to Defendants' interrogatories and document requests.
May 6, 2021	1.0	Prepared for and appeared at the Court conference regarding discovery disputes.
June 2, 2021	7.0	Prepared, appeared, and defended Plaintiff at her deposition.
June 4, 2021	6.0	Prepared for and conducted the third-party witness deposition of Lou Pellechio.
June 17, 2021	7.0	Prepared for and conducted the deposition of Julia Koch.

The requested billing records reflect 33 hours which, should the Court confirm the undersigned's rate of \$600 per hour, would calculate to be \$19,800. This supports a finding that the \$9,600 in attorney fees represents a fair and reasonable amount, particularly when considering the issues raised in the joint letter application. (Doc. 55)

We thank the Court for Your Honor's timely attention to this matter. Should the Court need anything further, please do not hesitate to contact the undersigned.

Respectfully submitted,




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